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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JON POKORSKI,

vs. Plaintiff,

ALLY FINANCIAL, INC.;  
EXPERIAN INFORMATION  
SOLUTIONS, INC.; TRANS UNION,  
LLC; EQUIFAX INFORMATION  
SERVICES, LLC,

Defendants.

Case No.: 2:25-cv-00472-JCM-EJY

**STIPULATION TO EXTEND TIME  
TO FILE REPLIES TO  
DEFENDANT ALLY FINANCIAL,  
INC.'S MOTION TO COMPEL  
ARIBTRATION [ECF NO. 20]**

(First Request)

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1       Currently pending before the court is Defendant Ally Financial Inc.’s  
2 (“Defendant”), Motion to Compel Arbitration (the “Motion”). ECF No. 20. The  
3 Motion was filed on June 11, 2025, the operative deadline for a response by Plaintiff  
4 Jon Pokorski (“Plaintiff”) is June 25, 2025, while Defendant’s reply is due by July 2,  
5 2025.

6       The Parties have met and conferred in good faith and hereby jointly stipulate and  
7 respectfully request a brief extension of the briefing schedule and hearing date related  
8 to Defendant’s pending Motion.

9       Counsel for Plaintiff has experienced an unexpected death in his immediate  
10 family, necessitating out-of-state travel and time away from work to manage urgent  
11 family obligations. In light of these unforeseen circumstances, and to ensure adequate  
12 time to prepare the necessary briefing, the Parties stipulate to the following revised  
13 schedule:

- 14       • Plaintiff’s deadline to file an opposition to Defendant’s Motion shall be  
15           extended by 21 days;  
16       • Defendant’s deadline to file a reply in support of its Motion shall be  
17           extended by 14 days thereafter; and

18       This is the Parties’ first stipulation to extend these deadlines. The requested  
19 extension is made in good faith, not for purposes of delay, and will not prejudice either  
20 party. The requested relief is narrowly tailored to accommodate unavoidable personal  
21 circumstances while preserving the Court’s schedule and judicial efficiency.

22       Accordingly, the Parties respectfully request that the Court approve this  
23 stipulation and enter an order adopting the revised schedule outlined above.

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1 IT IS THEREFORE STIPULATED between the Parties as follows:

- 2 (1) Plaintiff's response to the Motion will be due on or before **July 16, 2027**;
- 3 (2) Defendant's reply in support of its Motion, will be due on or before **July**  
4 **30, 2025.**

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6 Dated: June 18, 2025

**KAZEROUNI LAW GROUP, APC**

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8 By: /s/ Gustavo Ponce  
9 Gustavo Ponce  
Mona Amini  
10 Attorneys for Plaintiff

11 Dated: June 18, 2025

**TROUTMAN PEPPER LOCKE LLP**

12 By: /s/ Holly Cheong  
13 Holly Cheong, Esq.  
14 Attorneys for Defendant

15 **ORDER**

16 IT IS SO ORDERED.

17   
18 Layna J. Zouchah  
19 UNITED STATES MAGISTRATE JUDGE

20 Dated: June 18, 2025